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[Additional Counsel Listed on Signature  
Page]

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

CUNG LE, NATHAN QUARRY, JON FITCH,  
BRANDON VERA, LUIS JAVIER VAZQUEZ,  
AND KYLE KINGSBURY, on behalf of  
themselves and all others similarly situated,

No.: 2:15-cv-01045-RFB-BNW

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendant.

KAJAN JOHNSON and CLARENCE  
DOLLAWAY, on behalf of themselves and all  
others similarly situated,

No.: 2:21-cv-01189-RFB-BNW

Plaintiffs,

v.

ZUFFA, LLC (d/b/a Ultimate Fighting  
Championship and UFC) and Endeavor Group  
Holdings, Inc.,

Defendants.

**SCHEDULING STIPULATION FOR BRIEFING  
ON DISCOVERY IN *LE* AND *JOHNSON***

Nos: 2:21-cv-01189-RFB-BNW, 2:15-cv-1045-RFB-BNW

**SCHEDULING STIPULATION FOR BRIEFING  
ON DISCOVERY IN *LE* AND *JOHNSON***

Plaintiffs Kajan Johnson and Clarence Dollaway (“Plaintiffs”) and Defendants Zuffa LLC (“Zuffa”) and Endeavor Group Holdings, Inc. (“Endeavor,” together with Zuffa, “Defendants,” and collectively with Plaintiffs: the “Parties”), submit this stipulation on the briefing schedule for resolving the Parties’ dispute regarding whether discovery taken in *Le v. Zuffa*, No. 15-cv-0145 (D. Nev.) (“*Le*”) may be treated as taken in *Johnson v. Zuffa*, No. 21-cv-01189 (D. Nev.) (“*Johnson*”) and whether discovery taken in *Johnson* may be treated as taken in *Le*.

On September 22, 2023, the parties submitted a Joint Discovery Plan and Scheduling Order that, in relevant part for the purposes of this stipulation, stated:

The Parties are cognizant of the overlap between certain factual matters in the *Le* and *Johnson* cases. As a result, the Parties are meeting and conferring in an effort to come to agreement on whether discovery in each of the two actions should be treated as though taken in the other action, and if so, whether there should be any restrictions on such usage. Within the next thirty days, the Parties will either bring a stipulation to the Court for approval, or agree on an expedited briefing process to have the Court resolve the issue.

ECF No. 82 at 9. The Parties have conferred but failed to reach agreement on the issue of whether discovery in each of the two actions should be treated as though taken in the other action, and if so, whether there should be any restrictions on the use of such discovery.

Accordingly, and pursuant to Local Rule 7-2, the Parties have agreed to the following briefing schedule:

Case Event	Date
Defendants’ Motion re <i>Johnson</i> Discovery	October 26, 2023
Plaintiffs’ Opposition re Defendants’ Motion	November 9, 2023
Defendants’ Reply re Plaintiffs’ Opposition	November 16, 2023

The foregoing stipulation does not affect the briefing schedule the Court has already set for the motion the Court authorized Defendant Zuffa, LLC to file seeking to re-open discovery in

Nos: 2:21-cv-01189-RFB-BNW, 2:15-cv-1045-RFB-BNW

SCHEDULING STIPULATION FOR BRIEFING  
ON DISCOVERY IN *LE* AND *JOHNSON*

*Le v. Zuffa, LLC*, No. 15-cv-1045 (D. Nev.), as set forth in ECF No. 847. Those deadlines remain as follows:

Case Event	Deadline
Defendant Zuffa, LLC's Motion to Re-Open Discovery in <i>Le v. Zuffa, LLC</i>	October 24, 2023
Plaintiffs' Opposition re Defendant's Motion	November 21, 2023
Defendant's Reply re Plaintiffs' Opposition	December 19, 2023

DATED: October 13, 2023

Respectfully Submitted,

By: /s/Eric L. Cramer  
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ON DISCOVERY IN *LE* AND *JOHNSON*

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10 *Attorney for Defendants Zuffa, LLC and Endeavor*  
11 *Group Holdings, Inc.*

12 **IT IS SO ORDERED**

13 **DATED:** 10:23 am, October 16, 2023

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15 **BRENDA WEKSLER**  
16 **UNITED STATES MAGISTRATE JUDGE**  
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